

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

CYNTHIA GEIGER,

PLAINTIFF,

V.

RYAN FULLER SMALLWOOD,

DEFENDANT.

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CASE NO. 3:06cv194-WHA

**JOINT MOTION TO EXTEND DEADLINE  
FOR COMPLETION OF DISCOVERY**

COMES NOW the Plaintiff and Defendant, by and through their counsel of record, and move this Honorable Court to extend the deadline for completion of discovery, and as grounds for such would show unto the Court the following:

1. The parties have been actively involved in settlement negotiations, and have delayed completion of discovery pending settlement to reduce costs.
2. The case will not be settled.
3. The parties need additional time to complete discovery.
4. Allowing additional time will not delay any aspect of the trial.
5. Allowing additional time will not prejudice either party.

WHEREFORE, the parties respectfully request that the Court extend the deadline for completion of discovery until 1 April 2007.

Respectfully submitted this the 15 day of January 2007.

  
Benjamin H. Parr (PAR-112)

  
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